

Affidavit in Support of Criminal Complaint and Arrest Warrant for
Raul Bella Rojas AKA: Raul Bello Rojas

I, Michael Vargas, a Special Agent of the Department of Homeland Security, Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), being duly sworn, state as follows:

INTRODUCTION

1. I am presently a Special Agent of the Department of Homeland Security, Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) and serve as a sworn law enforcement officer within the meaning of Section 2510(7) of Title 18, United States Code. In that capacity, I am empowered to conduct investigations pursuant Section 2516(a) of Title 18 United States Code and to make arrests for offenses enumerated in Titles 8, 18, 19, 21, 31 United States Code and other related offenses. During my tenure as a Special Agent, I have completed approximately 1080 hours of instruction at the Federal Law Enforcement Training Center in Glynco, Georgia (FLETC). Prior to my tenure as a Special Agent with Homeland Security Investigations, I was employed by the Gaston County Police Department in North Carolina where I held multiple positions throughout my career, to include Detective within the Special Investigations Unit (“SIU”) and Task Force Officer (“TFO”) with HSI. As a Detective within SIU and TFO with HSI, I was tasked with investigating organized crime and vice activities, to include but not limited to narcotics distribution. As a result of these investigations, I participated in the execution of search warrants which led to the seizure of controlled substances, U.S. Currency, and other items. Since becoming a federal law enforcement agent, I have directed and participated in numerous investigations involving narcotics distribution and bulk cash smuggling, including the execution of search warrants, including warrants to place tracking devices on vehicles. I have arrested and interviewed numerous defendants associated with narcotics distribution offenses. As

a federal law enforcement agent, I am authorized to investigate violations of laws of the United States, to make arrests for such violations, and to execute warrants issued under the authority of the United States.

2. In the course of my duties, I have worked as a lead case agent, directing investigations concerning narcotics importation and distribution. I have conducted surveillance of individuals involved in narcotics distribution offenses. I have initiated, executed, and been involved in investigations resulting in numerous arrests for narcotics violations. As a result of these investigations, I have interviewed defendants, witnesses, and informants concerning the illegal trafficking of controlled substances.

3. This Affidavit is presented in support of a Criminal Complaint charging **Raul Bella Rojas AKA: Raul Bello Rojas** with a violation of Title 8, United States Code, Section 1326.

4. This Affidavit contains information necessary to support probable cause for the Criminal Complaint. The information contained in this Affidavit is based on my personal participation in the investigation of the case and from information provided to me by other Special Agents and Task Force Officers, as well as other federal, state, and local law enforcement officers. Since this Affidavit is being submitted for the limited purpose of establishing probable cause for the issuance of a Criminal Complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts which I believe are necessary to establish the requisite foundation for probable cause.

FACTS IN SUPPORT OF PROBABLE CAUSE

5. Homeland Security Investigations Carolina Financial Crimes Task Force is conducting a criminal investigation of **Raul Bella Rojas (ROJAS)** regarding violations of Title

21 United States Code §§ 841(a), 846, 18 United States Code § 1956 and Title 8, United States Code § 1326.

6. On February 28, 2025, at approximately 1015 hours Charlotte Mecklenburg Police Department conducted a vehicle stop as part of an enforcement action on a white Toyota Camry (NC-KFS8213); the driver and sole occupant was ROJAS.

7. It was determined that ROJAS was a citizen of Mexico and had numerous prior removals from the United States.

8. In the course of investigating this matter, I have reviewed the official Alien file (A-file) A089-941-037. This file contains ROJAS' biographical information, family history, records of encounters with ICE or Customs and Border Protection (CBP) (if any), conviction records (if any), photographs, and fingerprints. Based on the review of this A-file and other records, I have concluded that it does in fact pertain to the defendant in this matter.

9. The A-File and other records reflect the following information:

- a. ROJAS is a citizen and national of Mexico.
- b. ROJAS' date of birth is December 10, 1981, and his name is correctly reflected in this affidavit and the complaint to which this is attached.
- c. ROJAS, on or about June 25, 2005, arrived in the United States at or near Tucson, Arizona without being admitted or paroled by an Immigration Officer. ROJAS was apprehended by Border Patrol and voluntarily returned to Mexico.
- d. ROJAS, on or about November 27, 2009, was located at the Fairfax Adult Detention Center, after he was arrested for the offense of Assault and Battery on a Family Member in violation of VA Code 18.2-57.2.

- e. ROJAS, on or about December 1, 2009, fell into ICE custody due to an immigration detainer, ROJAS was processed and given a Notice to Appear.
- f. On or about May 18, 2010, an Immigration Judge in Arlington, VA issued an order of removal in *absentia* for ROJAS.
- g. ROJAS, on or about June 29, 2010, was found guilty of Assault and Battery on a Family Member in violation of VA Code 18.2-57.2.
- h. ROJAS, on or about October 1, 2010, was removed to Mexico from Washington, DC.
- i. ROJAS, on or about September 7, 2012, was convicted in Del Rio, Texas for Illegal Entry by an Alien in violation of 8 U.S.C. 1325(a)(1) and sentenced to 180 days plus probation.
- j. ROJAS, on or about December 21, 2013, was charged by Fairfax County Police Department for DWI, 1st Offense; no drivers license; and gross wanton, or reckless care for a child.
- k. ROJAS, on or about December 14, 2014, was arrested in Utah for two counts of possession of controlled substance schedule I or II, dangerous drugs, and giving false personal identity to peace officer.
- l. ROJAS, on or about March 16, 2015, was charged in Salt Lake City, UT for Illegal Re-entry of a Deported Alien in violation of 8 U.S.C. 1326(a). ROJAS was sentenced to 75 days followed by supervised release for 24 months.
- m. ROJAS was issued a Warrant of Removal/Deportation (Form I-205) on December 31, 2014.

- n. ROJAS was deported to Mexico on or about April 21, 2015, near El Paso, Texas.
- o. On May 3, 2019, an Immigration Judge issued a Notice of Intent/Decision to Reinstate Prior Order (Form I-871).
- p. On or about April 20, 2019, ROJAS was detained in Fairfax County, Virginia. On October 26, 2020, ROJAS was ordered removed by an Immigration Judge in Arlington, VA.
- q. A review of the A-File revealed ROJAS was previously removed from the United States on numerous occasions, including: October 1, 2010; January 1, 2012; January 17, 2012; March 29, 2012; March 4, 2013; and April 21, 2015.

10. A search of EARM showed ROJAS' last removal to Mexico on December 1, 2020. ROJAS of his own volition, reentered the United States after December 1, 2020, and did so, without having obtained the express consent of the Attorney General, or his successor, the Secretary of Homeland Security, to reapply for admission to the United States. Further, no approved or pending applications or petitions were identified that would have granted ROJAS' permission to enter or reside lawfully in the United States.

CONCLUSION

11. Based upon my training and experience and the facts of this investigation, I submit that there is probable cause for a criminal complaint against, and arrest warrant for **Raul Bello ROJAS** for the charge of Illegal Reentry of an Alien Following Deportation in violation of Title 8, United States Code, Section 1326(a). I request that the Court issue a Criminal Complaint and Arrest Warrant for the same.

Respectfully submitted,

/s/ Michael Vargas

Michael Vargas, Special Agent
Immigration Customs Enforcement
Homeland Security Investigations

This Affidavit was reviewed by AUSA William T. Bozin.

In accordance with Rule 4.1(b)(2)(A), the Affiant attested under oath to the contents of this Affidavit, which was submitted to me by reliable electronic means, on this 28th day of February, 2025, at 5:16 PM



W. Carleton Metcalf
United States Magistrate Judge

